

Peter Szanto 949-887-2369
11 Shore Pine
Newport Beach CA 92657

U.S. BANKRUPTCY COURT

DISTRICT OF OREGON

1050 SW 6th Ave #700 Portland, OR 97204 (503) 326-1500

In Re Peter Szanto,

Debtor

16 -bk-33185 pcm7

DEBTOR'S Unopposed
Motion to Postpone
Hearing of 11/26/19

1. Debtor's Certification Relating to Pre-filing Conference
(Certification Pursuant to LBR 7007-1 (a))

Pursuant to the Local Rule regarding conferral, Debtor contacted the counsel for Bank of America, Mr. Scott, regarding postponement of the hearing of 11-26-19 [EXHIBIT A]. Mr. Scott was in agreement that the current date of 11-26-19 was inconvenient for him as well [EXHIBIT B].

Thereupon, the parties agree that the 11-26-19 hearing should be postponed.

I certify under penalty of perjury under the laws of the United States,
that foregoing is true and correct. Signed at Irvine CA

Dated 11/19/ 2019 /s/ *signed electronically* Peter Szanto

2. FACTS

The parties agree that the 11-26-19 hearing regarding relief from stay is inconvenient for them both and so Debtor makes this unopposed motion for postponement.

3. MEMORANDUM

11 USC § 105 empowers this Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.”

Here, what the Court is requested to do is postpone the hearing of 11-26-19 because both sides are otherwise previously obligated and are unable to attend.

Debtor's inability to attend the hearing of 11-26-19 rises to the level

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2 of an impossibility, because he will be travelling by air, cross-country, the
3 entire day and will not even have access to phone service.
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6 **4. Conclusion**
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8 For the reasons enumerated, and other reasons to be explained
9 by testimony at any hearing which may be scheduled, Debtor prays for an
10 unopposed postponement of the hearing of 11-26-19.

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12 Respectfully,

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14 Dated 11/19/ 2019 /s/ *signed electronically* Peter Szanto
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2 **PROOF of SERVICE**

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4 My name is Maquisha Reynolds, I am over 21 years of age and not a party to
5 the within action. My business address is PO Box 14894, Irvine CA 92623

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7 On the date indicated below, I personally served the within: **Motion**
8 on the following by placing in postage pre-paid envelopes of the within
9 document and mailing same:

10 a. Internal Revenue Service, PO Box 7346, Philadelphia PA 19101
11 b. First Service Residential, 15241 Laguna Canyon Rd, Irvine CA 92618
12 c. JPMorgan BofA Bank, represented by:

13 Gadi Shahak c/o Shapiro & Sutherland
14 1499 SE Tech Center Place, Suite 255 , Vancouver, WA 98683
15 d. Bank of America, c/o McCarthy & Holthus 920 SW 3rd Av., Portland OR 97204
16 e. Oregon Department of Revenue, 955 Center St., Salem OR 97301
17 f. Chapter 7 Trustee, Ms Amborn, PO Box 580, Medford, OR 97501
18 g. Susan Szanto - 11 Shore Pine, Newport Beach CA 92657
19 h. Office of the US Trustee, 620 SW Main Street, Suite 213, Portland, OR 97205
20 by mailing copies to the above parties *via* 1st class mail, postage prepaid, or by
21 e-mail.

22 I declare under penalty of perjury under the laws of the United States
23 that the foregoing is true and correct. Signed at Irvine CA.

24 Dated 11/19/ 2019 /s/ signed electronically M. Reynolds